To: Bolt, Matthew[Bolt.Matthew@epa.gov]
From: Goldmann, Elizabeth
Sent: Tue 8/1/2017 6:26:10 PM
Subject: FW: OAW
Water Quality Notice of Final Rulemaking 2008.pdf
FW: From Hunter- Phone Call Documents
Fwd: AMA comments on Davidson Canyon OAW
Copy of Davidson 2016 (002).xlsx

From: Julia Fonseca [mailto:Julia.Fonseca@pima.gov]
Sent: Monday, July 31, 2017 10:58 AM
To: Goldmann, Elizabeth <Goldmann.Elizabeth@epa.gov>
Cc: Linda Mayro <Linda.Mayro@pima.gov>
Subject: OAW

Hi, Elizabeth,

I would like you to know that many of the arguments Hudbay is making were brought up years ago in the Triennial Review, i.e. ephemerality and the watershed not being "pristine". See attached letter which Arizona Mining Association wrote, and also the notice of Rulemaking by ADEQ at conclusion of Triennial Review (Dec 2008).Regarding water quality, their argument was lack of demonstrating that metals met standards because of detection limits. There was additional data collected by them in 2008—I don't know if they ever submitted that.

See also attached documents transmitted to governor's office—copies of correspondence between ADEQ and HudBay on the Triennial Review.

ADEQ's August 2016 sampling for metals at the OAW identifies no exceedances. There was a hit on lead on upper Davidson-shown with red highlight on the attached.

Julia Fonseca, Environmental Planning Manager
Pima County Office of Sustainability and Conservation